

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE BLACKMON;
HERBERT ANTHONY GREEN; KHADAFY
MANNING; QUINNETTA MANNING; MARVIN
MCFIELD; NICHOLAS SINGLETON; STEVEN
SMITH; BESSIE THOMAS; and BETTY JEAN
WILLIAMS TUCKER, individually and on behalf of a
class of all others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI; SHERIFF
RANDALL S. TUCKER, in his official capacity; and
MADISON COUNTY SHERIFF'S DEPUTIES JOHN
DOES #1 through #6, in their individual capacities,

Defendants.

Civil Action No.
3:17-cv-00347-WHB-LRA

**PLAINTIFFS' UNOPPOSED MOTION TO SEAL AS
RESTRICTED PORTIONS OF CERTAIN EXHIBITS**

Pursuant to Rule 79(e) of the Uniform Local Rules of the United States District Courts for the Northern and Southern Districts of Mississippi, Plaintiffs respectfully move the Court to seal as restricted portions of the following exhibits (the "Restricted Exhibits") filed with Plaintiffs' Motion for Class Certification (ECF No. 231):

1. Exhibit 3, ECF No. 231-3
2. Exhibit 10, ECF No. 231-10
3. Exhibit 89, ECF No. 231-89

These exhibits have been publicly filed by Plaintiffs via ECF in redacted form. Plaintiffs respectfully submit that good cause exists for this Court to permit the public filing of the

Restricted Exhibits in redacted form, and therefore request that the Court (i) grant Plaintiffs' motion to seal the limited portions of the Restricted Exhibits that have been filed in redacted form and (ii) authorize Plaintiffs to conventionally file unredacted copies of the Restricted Exhibits with the Court, with CM/ECF access to these unredacted exhibits limited to Plaintiffs' and Defendants' counsel in this case. Plaintiffs are conventionally filing unredacted copies of the Restricted Exhibits with the Court as exhibits to this Motion.

The reasons for this motion are set forth in the accompanying memorandum of law.

Plaintiffs have conferred with counsel for Defendants and have confirmed that Defendants do not oppose this motion to seal. A proposed order has been prepared for the Court in conjunction with this motion.

RESPECTFULLY SUBMITTED, this 14th day of March, 2018.

SIMPSON THACHER & BARTLETT LLP

Jonathan K. Youngwood (*pro hac vice*)

Janet A. Gochman (*pro hac vice*)

Isaac Rethy (*pro hac vice*)

Kavitha S. Sivashanker (*pro hac vice*)

Nihara K. Choudhri (*pro hac vice*)

Christopher K. Shields (*pro hac vice*)

Brooke Jarrett (*pro hac vice*)

Christopher Jumin Lee (*pro hac vice*)

425 Lexington Avenue

New York, NY 10017

(212) 455-2000

jyoungwood@stblaw.com

jgochman@stblaw.com

irethy@stblaw.com

kavitha.sivashanker@stblaw.com

nchoudhri@stblaw.com

christopher.shields@stblaw.com

bonnie.jarrett@stblaw.com

christopherjumin.lee@stblaw.com

By: /s/ Joshua Tom
Joshua Tom

AMERICAN CIVIL LIBERTIES UNION
OF MISSISSIPPI FOUNDATION

Joshua Tom (Miss. Bar No. 105392)

233 East Capitol Street

Jackson, MS 39201

(601) 354-3408

JTom@aclu-ms.org

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION

Ezekiel Edwards (*pro hac vice*)

Jeffery Robinson (*pro hac vice* forthcoming)

125 Broad Street

New York, NY 10004

(212) 549-2610

eedwards@aclu.org

jrobinson@aclu.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2018, I caused the foregoing **UNOPPOSED MOTION TO SEAL AS RESTRICTED PORTIONS OF CERTAIN EXHIBITS** to be electronically filed with the Clerk of the Court using the CM/ECF system, through which copies have been served to:

WISE CARTER CHILD & CARAWAY, P.A.

Michael B. Wallace (Miss. Bar No. 6904)

Charles E. Ross (Miss. Bar No. 5683)

James E. Graves (Miss. Bar No. 102252)

Charles E. Cowan (Miss. Bar No. 104478)

T. Russell Nobile (Miss. Bar No. 100682)

Post Office Box 651

Jackson, MS 39205

(601) 968-5534

mbw@wisecarter.com

cer@wisecarter.com

jeg@wisecarter.com

cec@wisecarter.com

trn@wisecarter.com

CURRIE JOHNSON & MYERS, P.A.

Rebecca B. Cowan (Miss. Bar No. 7735)

P.O. Box 750

Jackson, MS 39205

(601) 969-1010

bcowan@curriejohnson.com

KATIE BRYANT SNELL, PLLC

Katie Bryant Snell (Miss. Bar No. 103607)

P.O. Box 3007

Madison, Mississippi 39130-3007

(601) 460-9800

Katie@katiebryantnell.com

PETTIS, BARFIELD & HESTER, P.A.

J. Lawson Hester (Miss. Bar No. 2394)

4450 Old Canton Road, Suite 210

Jackson, Mississippi 39211

(601) 987-5300

lhester@pbhfirm.com

s/ Joshua Tom

Joshua Tom